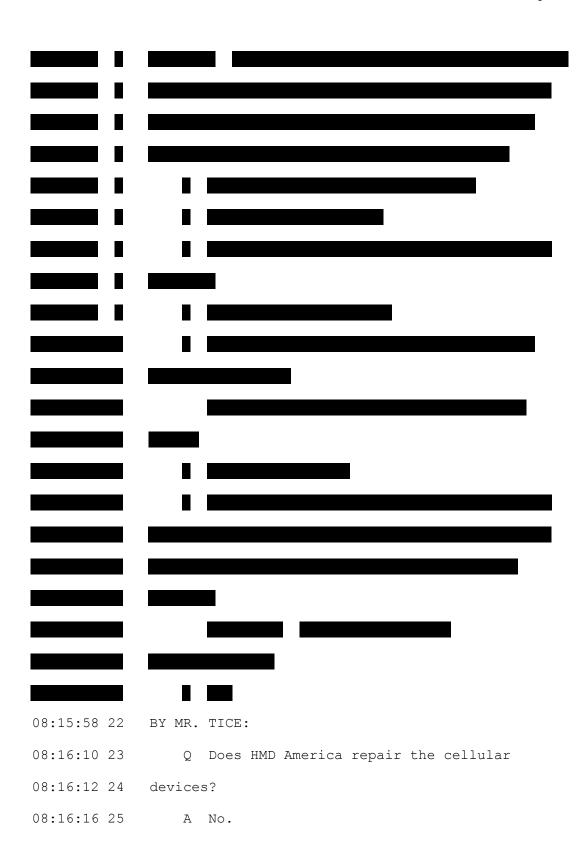
## Exhibit Q

1 Virtual Videotaped Deposition of REX FRYHOVER 3 Confidential - Outside Counsel Eyes Only Thursday, December 3, 2020 4 1:05 p.m. CST 5 6 NOTICE 7 This transcript is an UNCERTIFIED DRAFT 8 9 TRANSCRIPT ONLY. It contains the raw output from the court reporter's stenotype machine translated 10 11 into English by the court reporter's computer, without the benefit of proofreading. It will 12 13 contain untranslated steno outlines, 14 mistranslations (wrong words), and misspellings. 15 These and any other errors will be corrected in the final transcript. Since this draft transcript 16 has not been proofread, the court reporter cannot 17 18 assume responsibility for any errors. This draft transcript is intended to 19 20 assist attorneys in their case preparation and is 21 not to be construed as the final transcript. It is not to be read by the witness or quoted in any 22 23 pleading or for any other purpose and may not be 24 filed with any court.

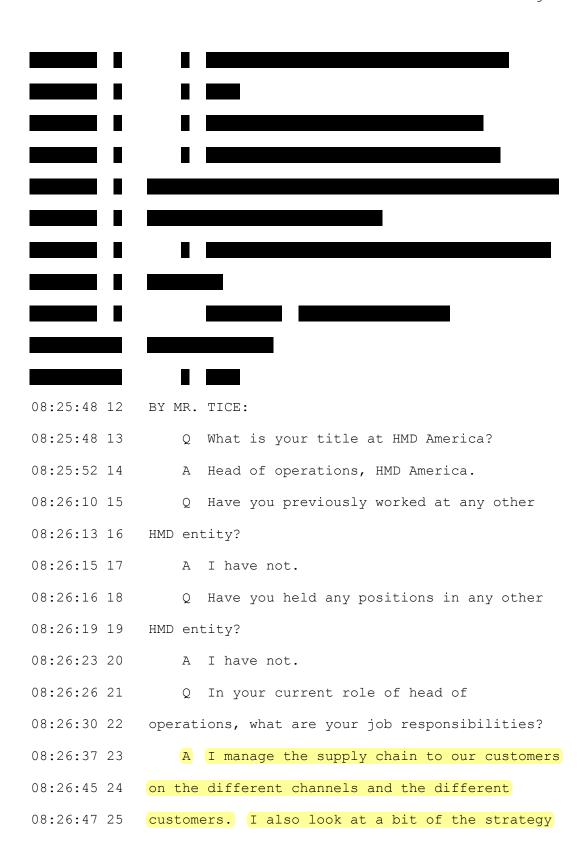
08:01:10	America. I'm also here on behalf of HMD Global OY
08:01:13	which is the defendant in the underlying action
08:01:15	and with me is in-house counsel Gen Silveroli.
08:01:28	REX FRYHOVER,
!	called as a witness herein, having been first duly
(	sworn, was examined and testified as follows:
08:01:29	EXAMINATION
08:01:29	BY MR. TICE:
08:01:30	Q Good morning, Mr. Fryhover.
08:01:32 10	A Good morning.
08:01:33 13	Q As I just stated my name is Jerry Tice and
08:01:36 12	I represent the plaintiff in this matter. I'd
08:01:38 13	like to thank you for being here today and for
08:01:40 1	your time today.
08:01:40 1	Could you please introduce yourself for
08:01:42 1	the court?
08:01:43 1	A Yes. My name is Rex Fryhover.
08:01:45 18	Q Is Rex Fryhover your full legal name?
08:01:48 19	A Rex Campbell Fryhover.
08:01:53 20	Q Where do you live, Mr. Fryhover?
08:01:56 23	A I live in Miami, Florida.
08:02:01 22	Q How long have you lived there?
08:02:13 23	A Three years, three and-a-half.
08:02:18 2	MR. TICE: Gen, I think if you can mute
08:02:21 2	your mic, you're getting some feedback from

08:10:49 1	A Yes.
08:11:12 2	Q I think we went into this a little bit in
08:11:15 3	a couple of previous answers, but what does HMD
08:11:18 4	America do?
08:11:20 5	MS. KASH: Objection to form.
08:11:24 6	BY THE WITNESS:
08:11:24 7	A Can you restate your question? I'm sorry.
08:11:26 8	BY MR. TICE:
08:11:27 9	Q What does HMD America do?
08:11:32 10	A We sell devices to different channels in
08:11:39 11	north and South America I'm sorry, in north and
08:11:42 12	Canada I'm sorry, US and Canada. Those devices
08:11:50 13	are localized and across different functions are
08:11:55 14	localized for the North America market, which has
08:12:01 15	very different requirements than, let's say other
08:12:04 16	markets around the world.
08:12:11 17	Q What do you mean by across different
08:12:15 18	functions are localized? What functions are you
08:12:18 19	referring to?
08:12:22 20	A Referring to supply chain, referring to
08:12:25 21	testing. I'm referring to marketing, all
08:12:33 22	corporate functions to be honest with you
08:12:35 23	including finance.
08:12:47 24	Q What types of devices does HMD America
08:12:49 25	sell?

08:12:53	1	A Cellular devices.
08:13:00	2	Q Does HMD America manufacture any cellular
08:13:07	3	devices?
08:13:09	4	A Do we manufacture, no, we do not
08:13:11	5	manufacture devices in the Americas.
08:13:16	6	Q Does HMD America assemble any cellular
08:13:23	7	devices?
08:13:24	8	MS. KASH: Objection. Form.
08:13:26	9	BY MR. TICE:

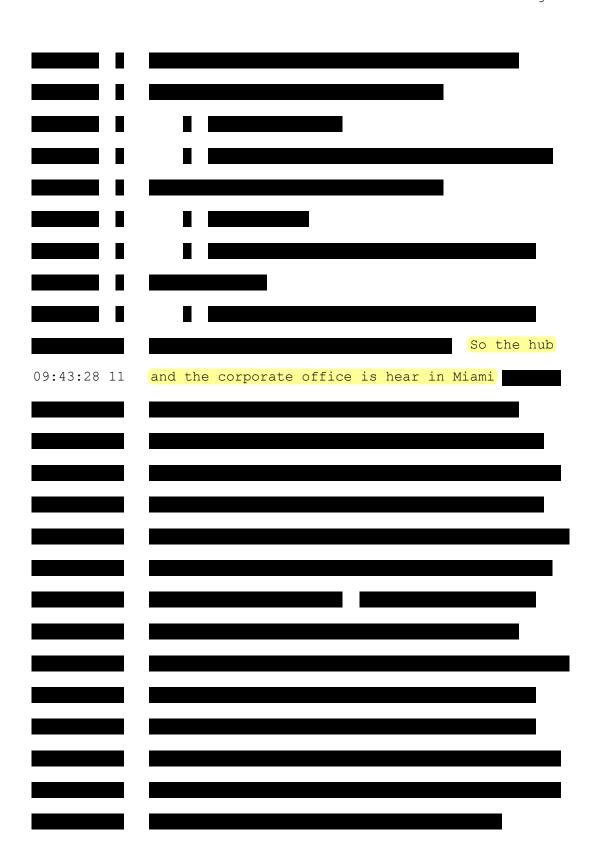


08:22:39 1	sells cellular devices.
08:22:41 2	Can you be more specific as to what type
08:22:43 3	of cellular devices HMD America sells?
08:22:49 4	A Yes. We sell smart devices and feature
08:22:53 5	phones which is let's say a non smart type of
08:22:57 6	device, the more basic candy bar type of what is
08:23:01 7	what we call it.
08:23:05 8	Q Does HMD America sell Nokia-branded
08:23:08 9	devices?
08:23:12 10	A Yes.
08:23:16 11	Q Does HMD America sell any cellular devices
08:23:20 12	that are not Nokia-branded devices?
08:23:26 13	A No.
08:23:28 14	Q Does HMD America sell any products that
08:23:33 15	are not Nokia-branded devices?
08:23:38 16	A No.



08:26:52 1	behind the supply chain and work with our
08:26:59 2	customers on some of those potential
08:27:01 3	opportunities.
08:27:59 10	Q How long have you been head of operations
08:28:01 11	at HMD America?
08:28:08 12	A Two years. Can you kind of state the time
08:28:15 13	frame that you mean?
08:28:20 14	Q Right. So you've been the head of
08:28:29 15	operations at HMD for about two years; is that
08:28:43 16	right?
08:28:43 17	A Correct.
08:28:44 18	Q Have you held any other positions at HMD
08:28:47 19	America?
08:28:47 20	A Yes, sales operations. It's been a mix of
08:28:51 21	sales operations and operations basically.
08:28:56 22	Q When were you strike that. When did
08:29:06 23	you have a sales operations position at HMD
08:29:09 24	America?
08:29:14 25	A When I started basically. That would have

09:40:31 1	Q What does involved mean to you?
09:40:36 2	MS. KASH: Objection to form.
09:40:37 3	BY THE WITNESS:
:	
09:41:08 9	BY MR. TICE:
09:41:18 10	Q I think that answers my question, thank
	you.
09:41:20 12	A Sure.
09:41:33 13	MR. TICE: Can we pull up Exhibit No. 3
09:41:34 14	for a second, Enrique.
09:41:59 15	BY MR. TICE:

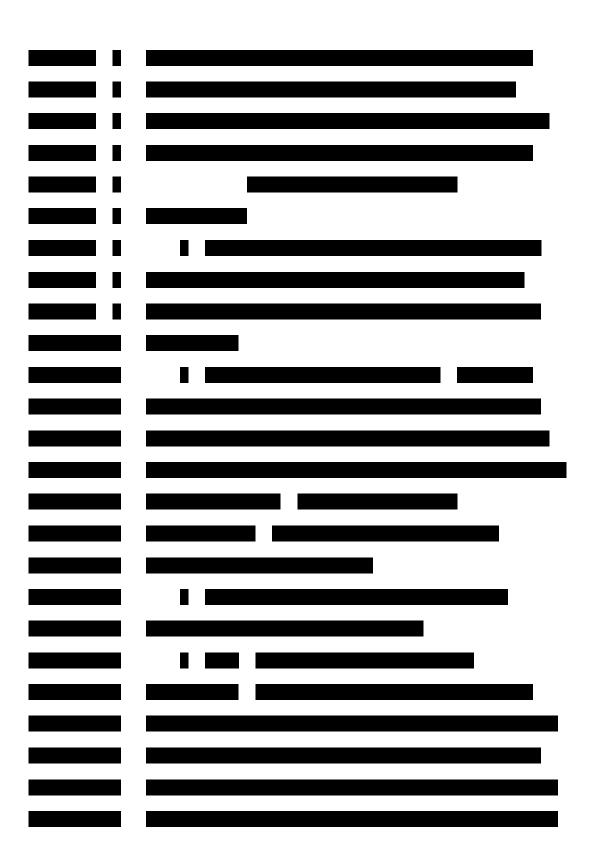


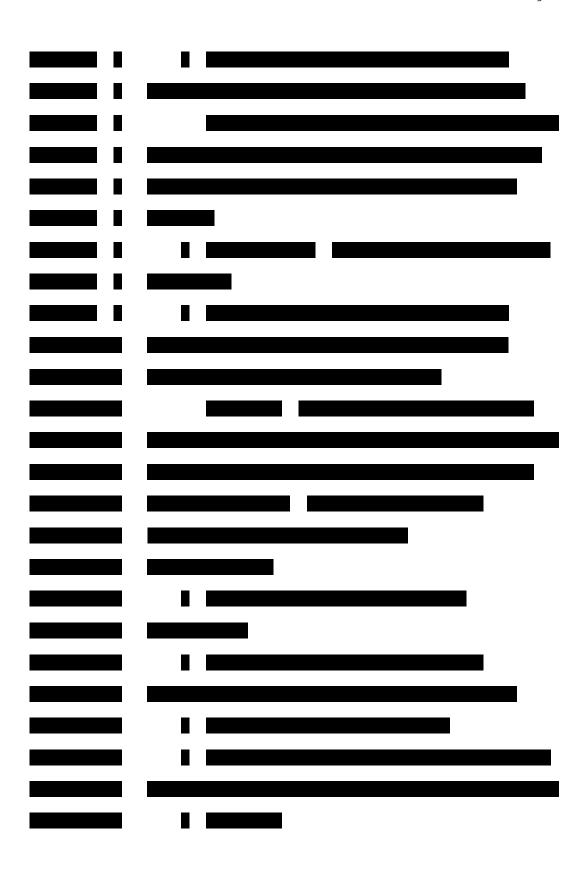
09:46:55	1	COVID and post-COVID that is very limited as we
09:46:59	2	all deal with.
09:47:04	3	Q Does HMD Global have any offices in the
09:47:08	4	US?
09:47:10	5	A No.
09:47:13	6	Q Does HMD Global have any employees in the
09:47:17	7	US?
09:47:21	8	A No.
09:47:26	9	Q Does HMD Global have employees that
09:47:33	10	regularly go to the US?
09:47:38	11	MS. KASH: Objection to form.
09:47:41	12	BY THE WITNESS:
09:47:42	13	A Can you rephrase your question? Sorry,
09:47:44	14	Mr. Tice.
09:47:44	15	BY MR. TICE:
09:47:48	16	Q Sure. So I understand HMD Global does not
09:47:51	17	have employees that are full-time in the US, but
09:48:00	18	do employees of HMD Global regularly travel to the
09:48:05	19	US?
09:48:07	20	MS. KASH: I'm sorry, objection to form.
09:48:15	21	BY THE WITNESS:
09:48:17	22	A Do we have regular not any time
09:48:20	23	recently clearly, and prior, you know, very
09:48:24	24	limited. We are a subsidiary so, yes, there is
09:48:38	25	some travel of HMD Global employees into the US.

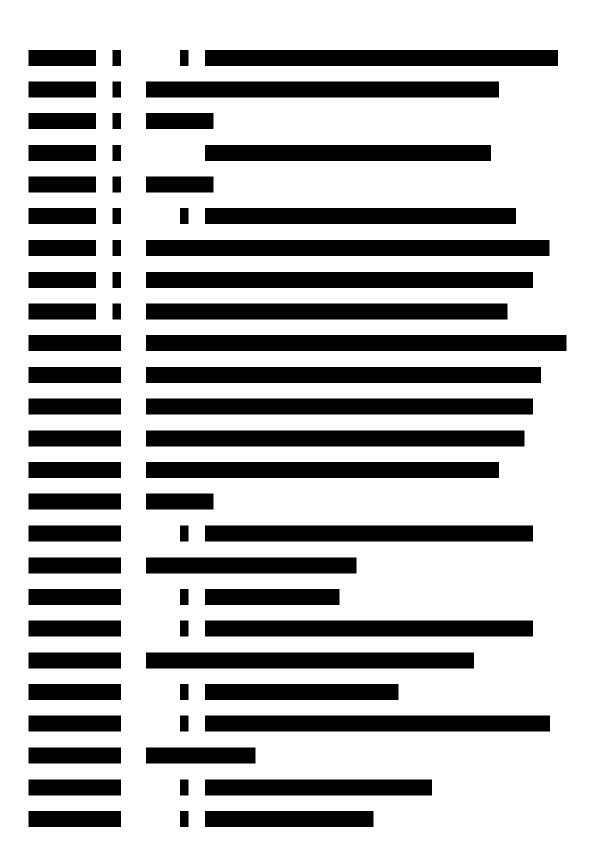
09:48:49 1	Q Do you know when HMD Global was formed?
09:48:59 2	A HMD Global OY, I don't. We just hit our
09:49:05 3	four-year anniversary. It was probably formed six
09:49:08 4	months, eight months, maybe a year before we went
09:49:13 5	live. I'm not sure. I don't know. I would
09:49:16 6	assume four to five years ago.
09:49:22 7	Q Do you know when HMD America was formed?
09:49:27 8	A No. I don't. I don't know when the legal
09:49:30 9	entity was formed.
09:49:42 10	Q Do you know why HMD America was formed?
09:49:44 11	MS. KASH: Objection to form.
09:49:51 12	BY THE WITNESS:
09:49:52 13	A Yes, as a legal entity and as a subsidiary
09:49:55 14	it needed to be formed to manage to drive and
09:50:00 15	manage our customers and the business here. It
09:50:08 16	would be yeah, that's my understanding. We had
09:50:11 17	to create a legal entity to have employees in the
09:50:13 18	US, you know, to provide 401-K benefits, to do all
09:50:20 19	those relative pieces so I think that goes across
09:50:23 20	multiple functions, but, yes.
09:50:36 21	BY MR. TICE:

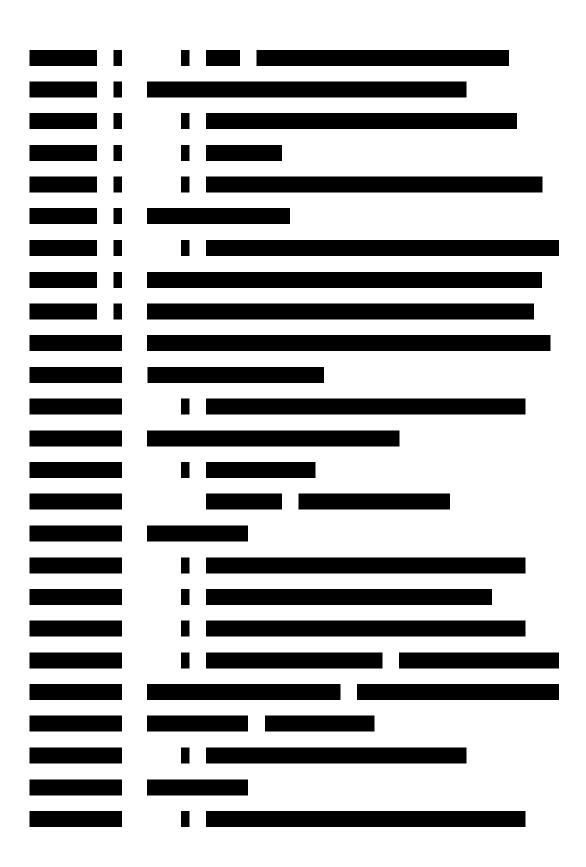


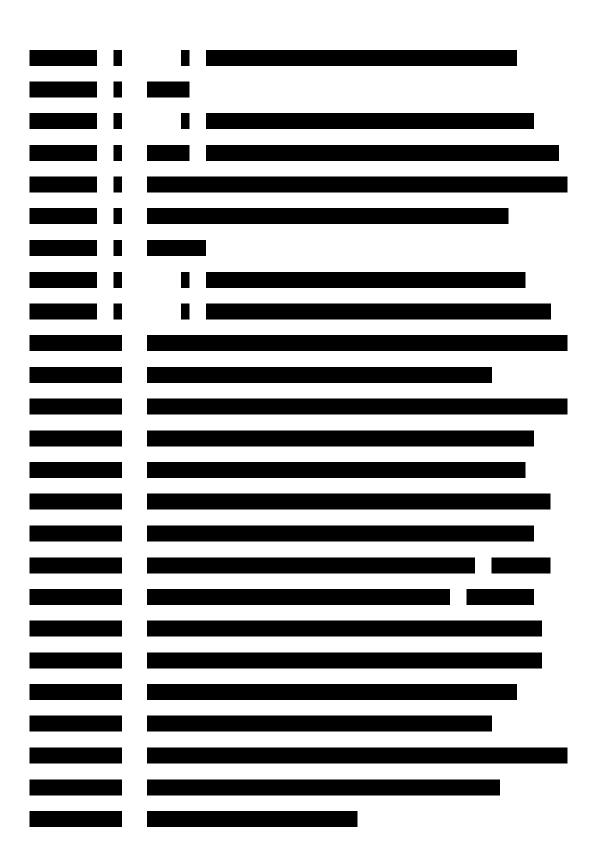
11:56:52	1	A No, they don't. All testing is localized
11:56:55	2	by HMD America.
11:57:03	3	Q And there's no testing done on behalf of
11:57:06	4	HMD Global in the United States?
11:57:07	5	MS. KASH: Objection to form.
11:57:10	6	BY THE WITNESS:
11:57:10	7	A Can you restate your question? I guess I
11:57:16	8	don't
11:57:17	9	BY MR. TICE:

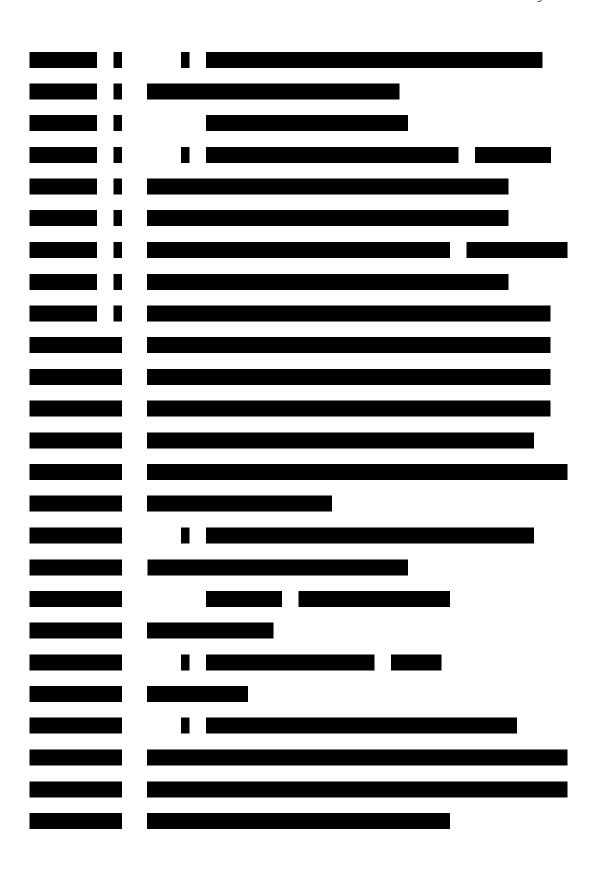


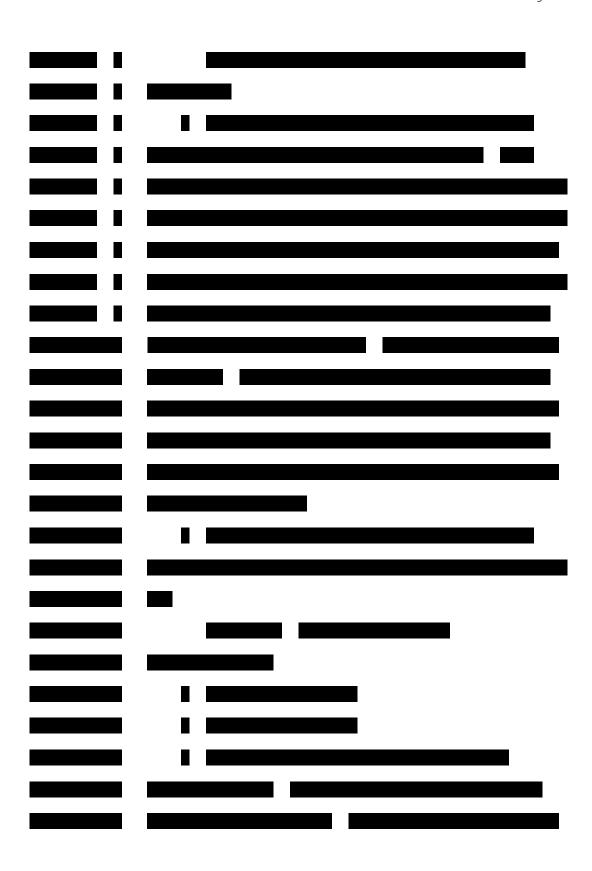


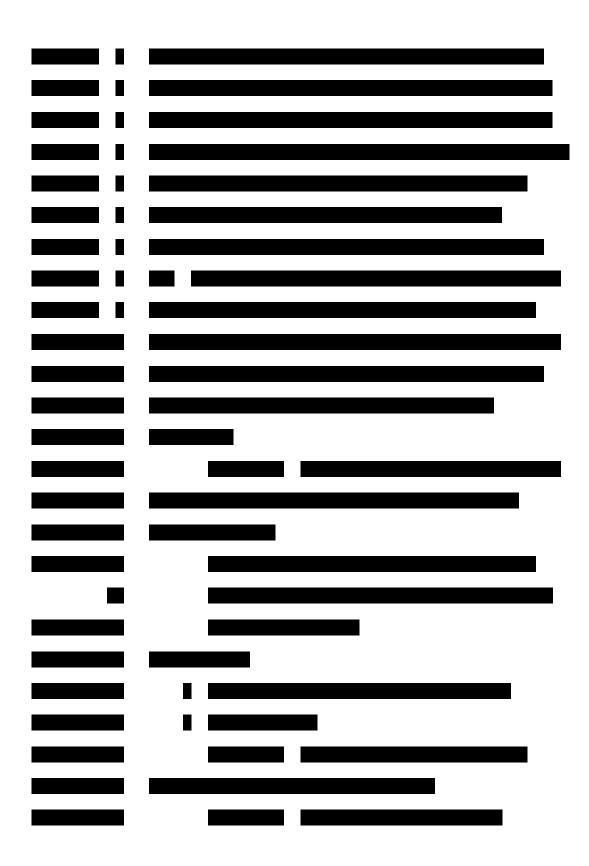


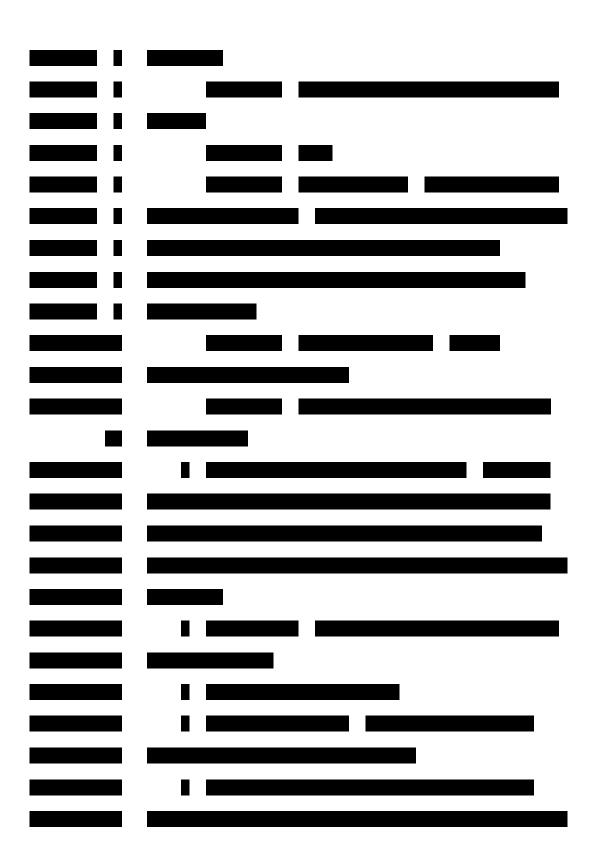


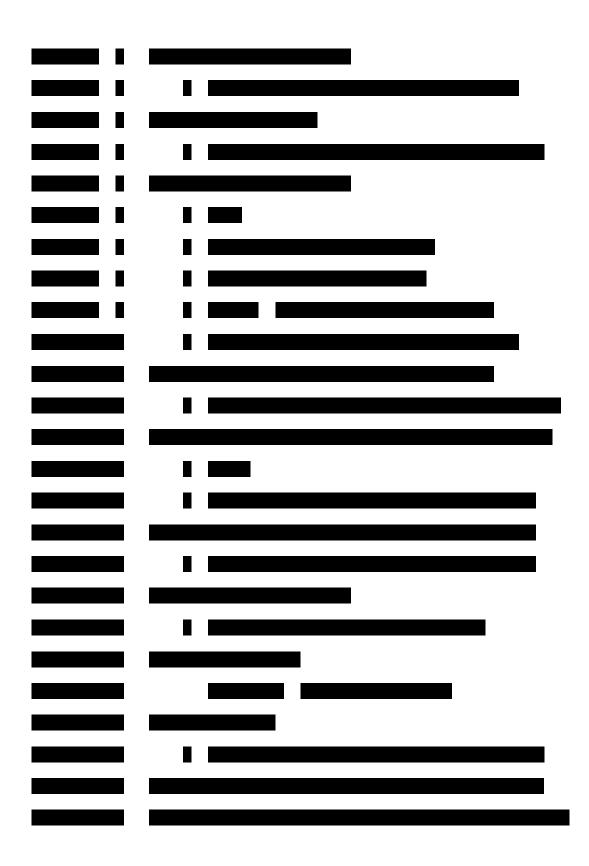


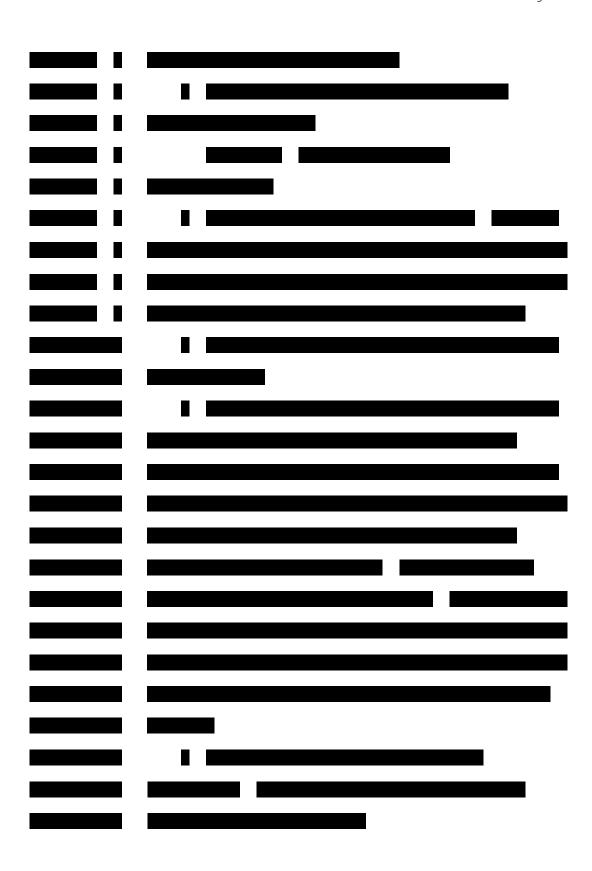


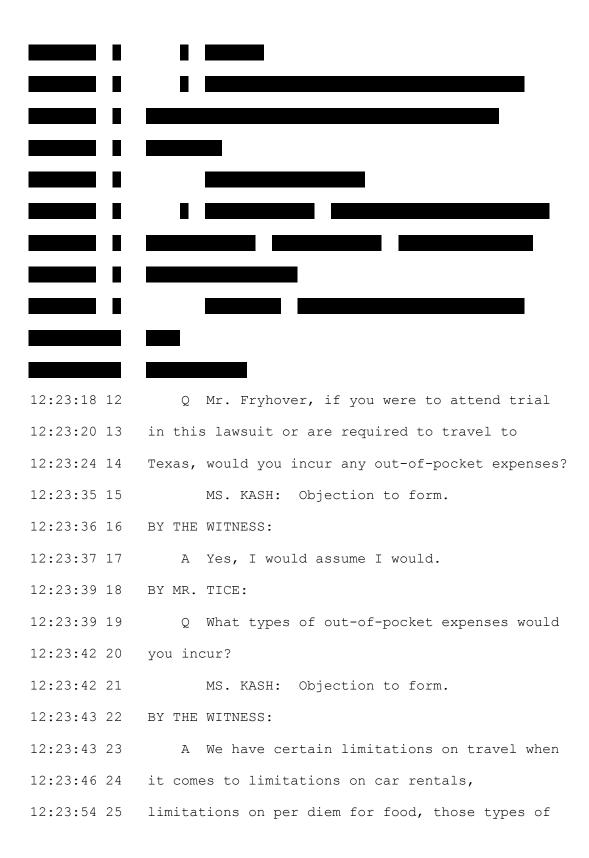


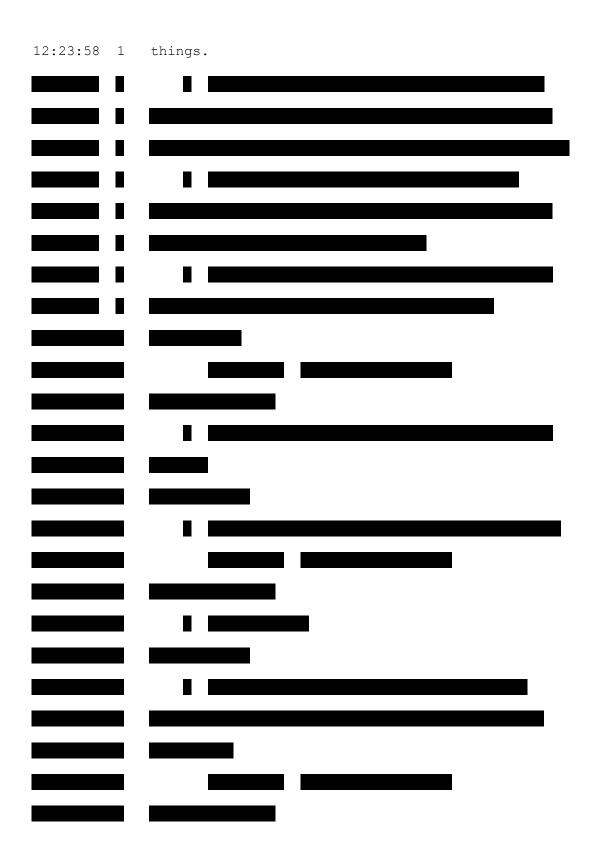


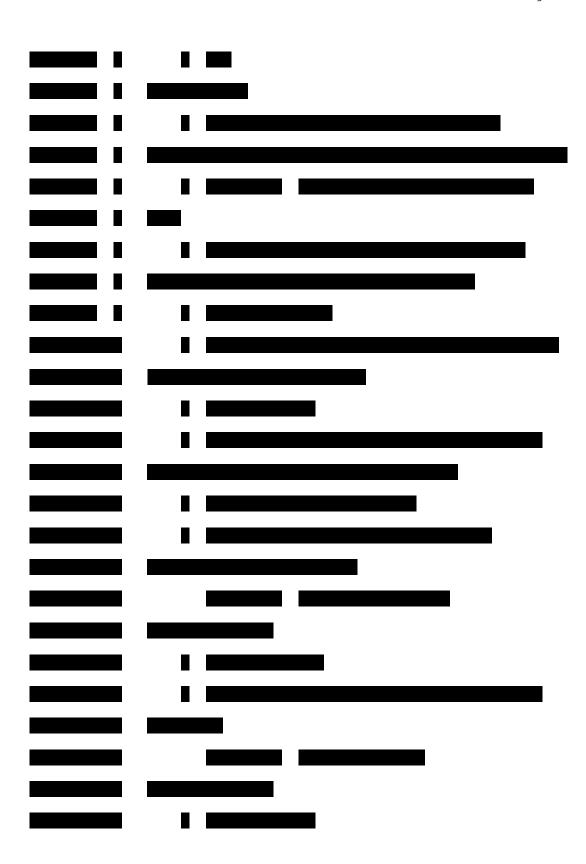


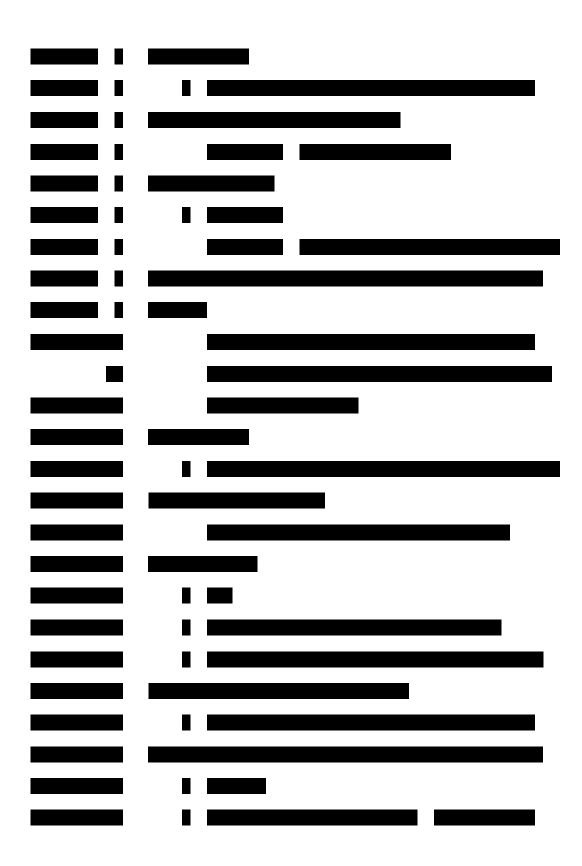




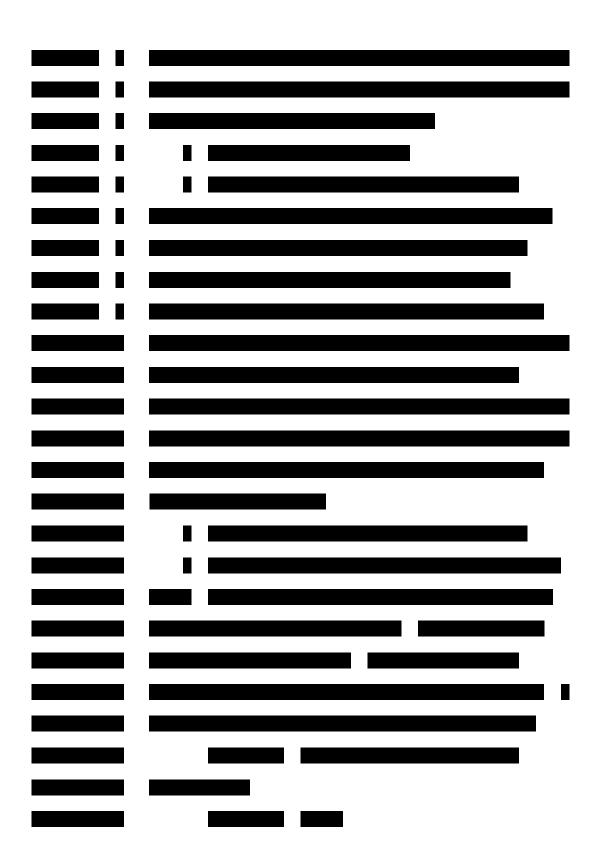


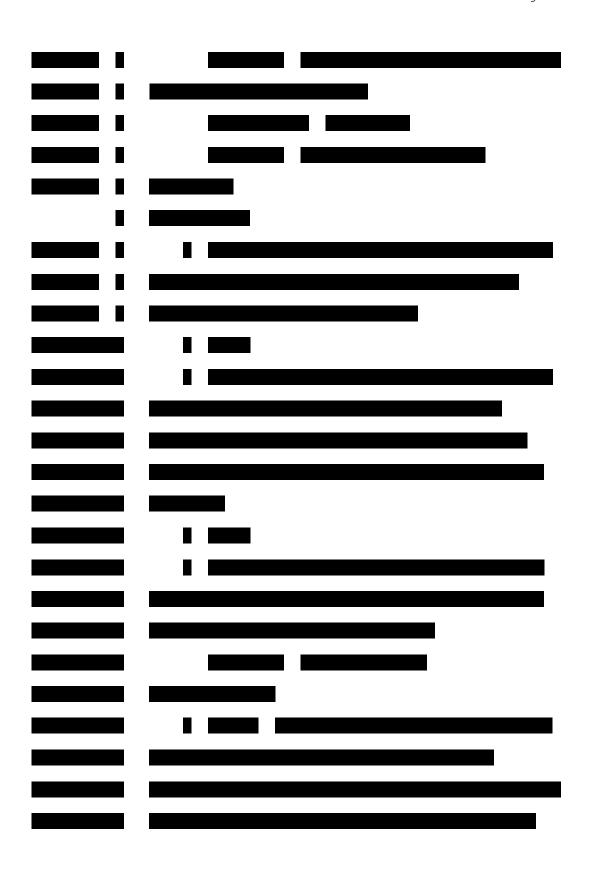


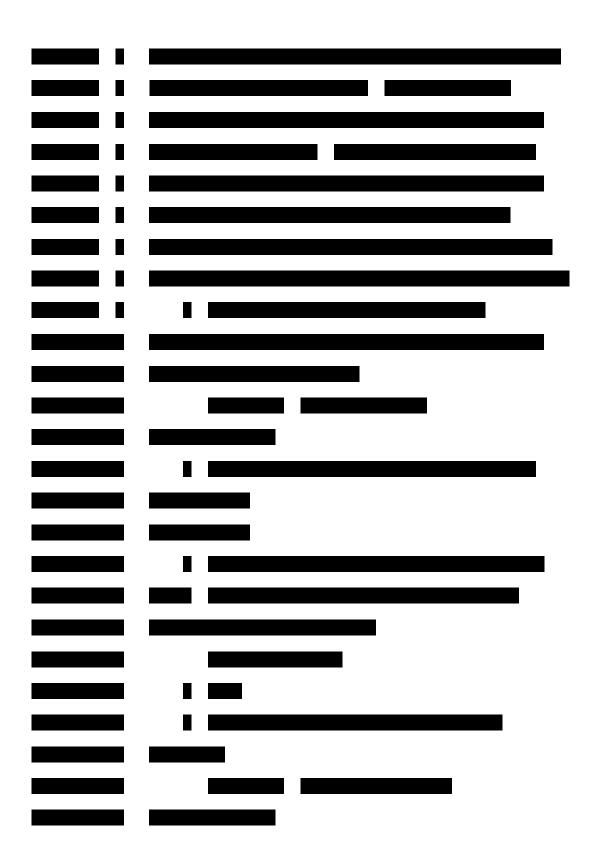


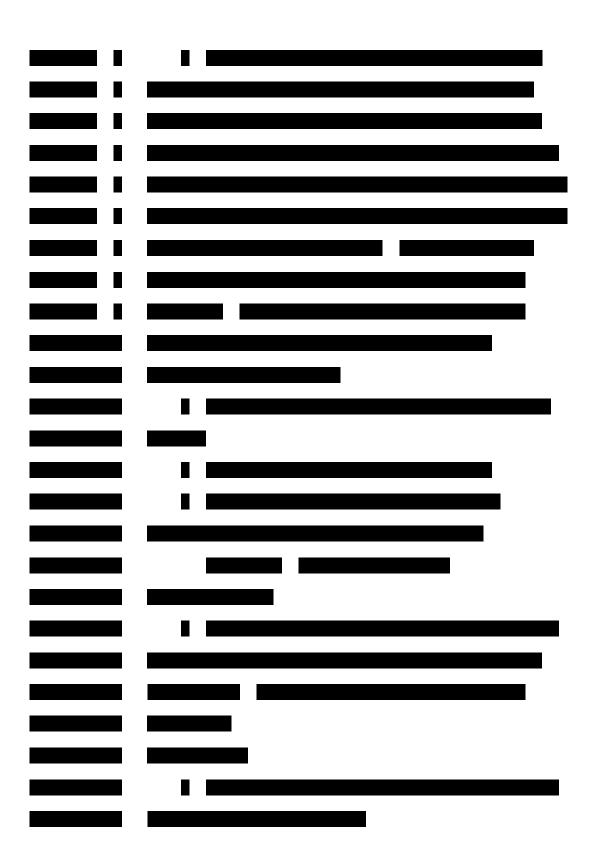




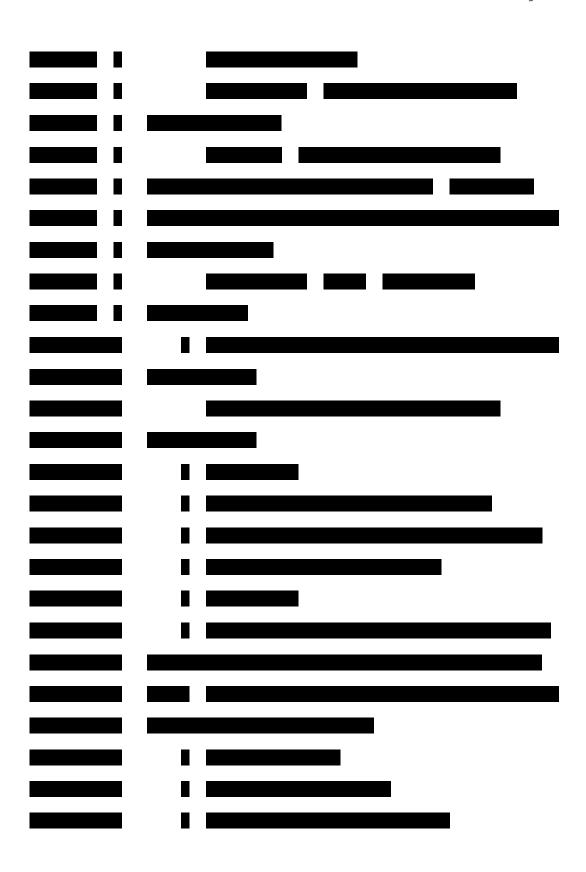


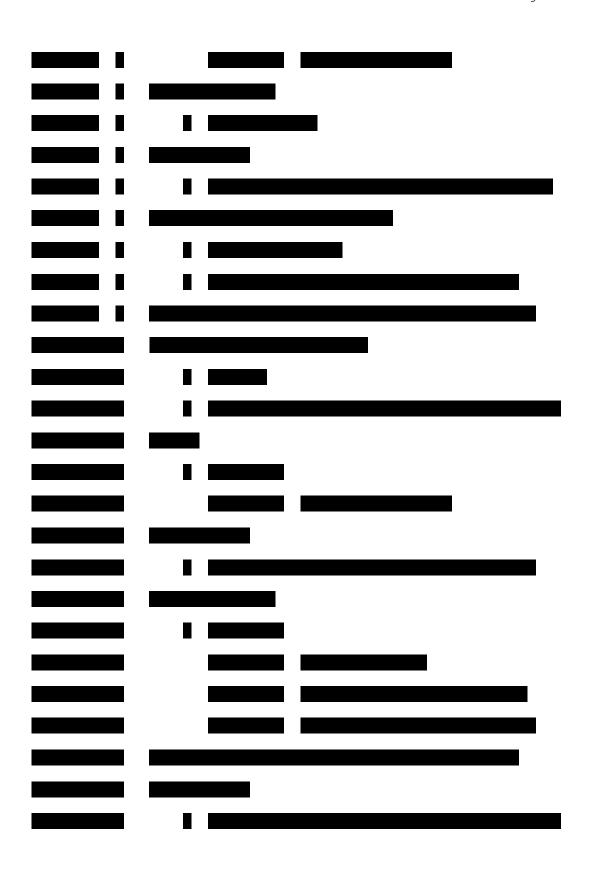




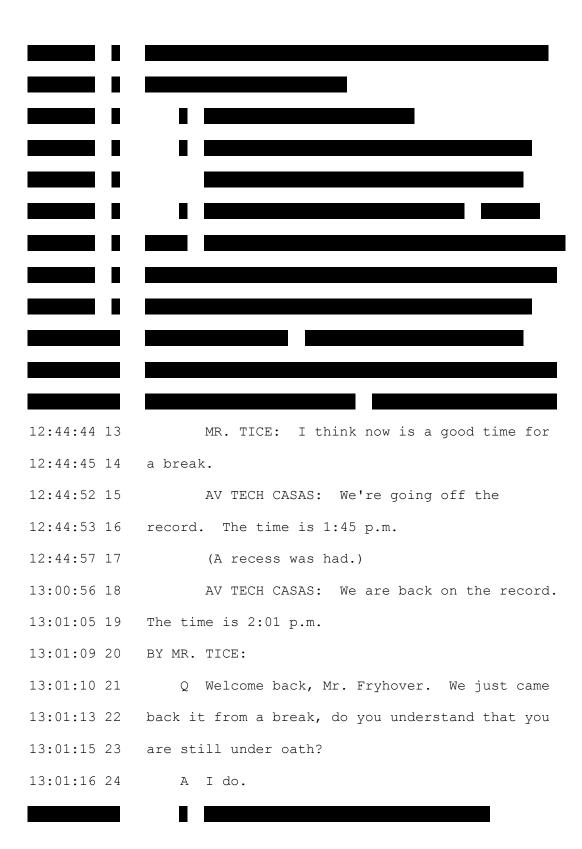


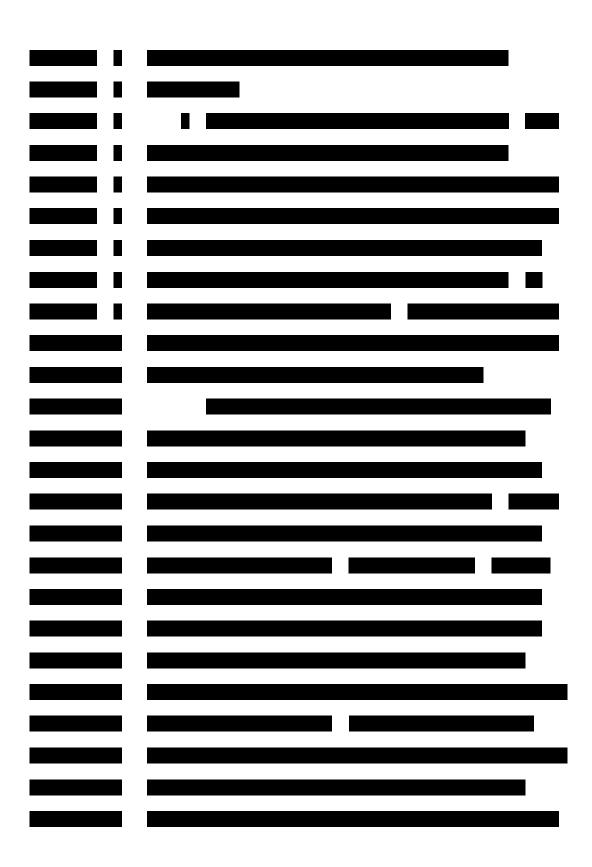


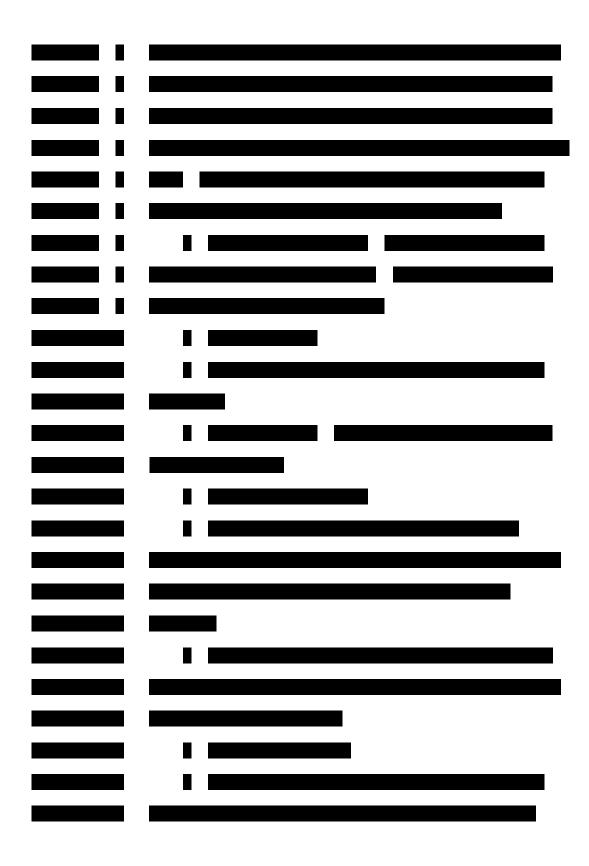


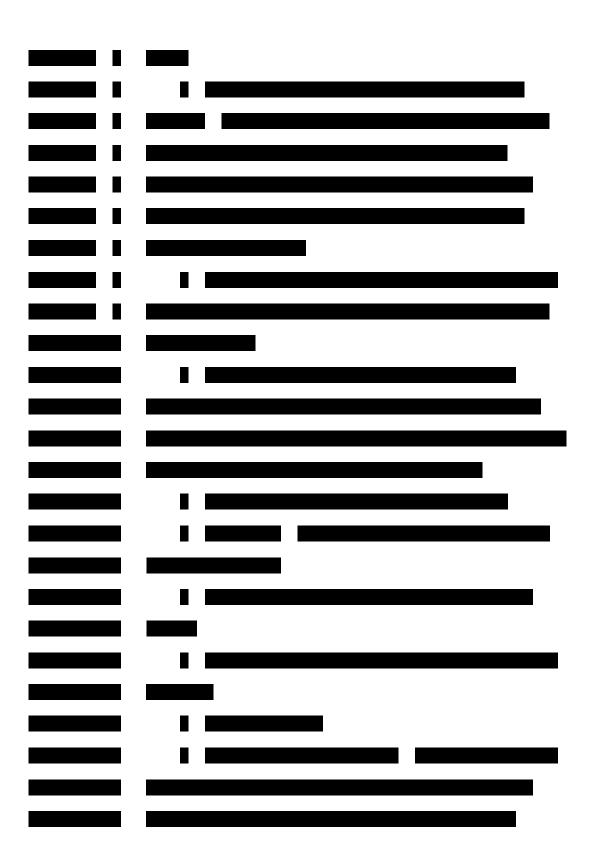


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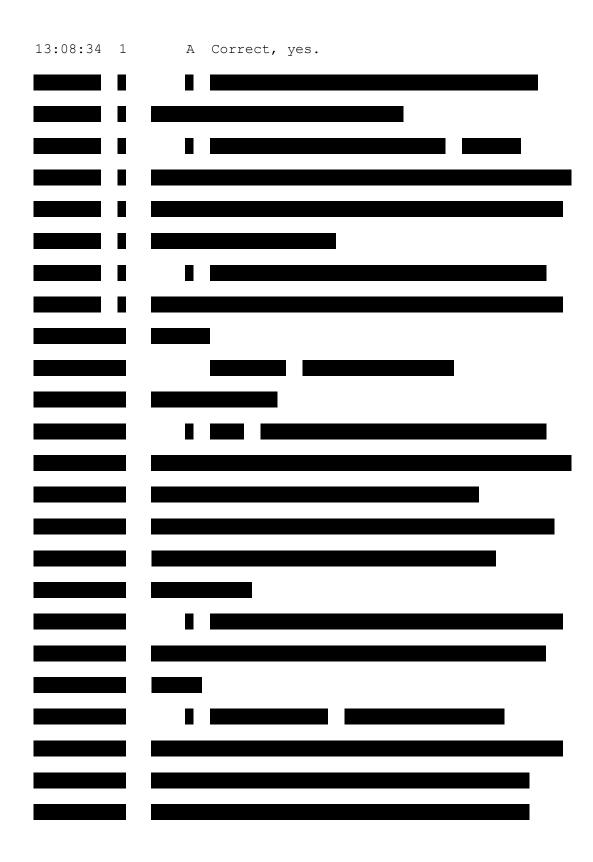


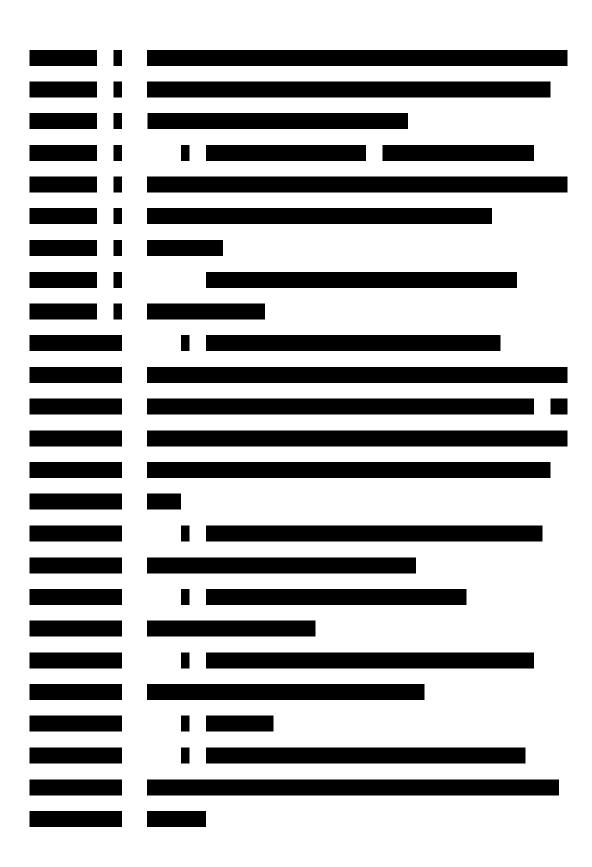


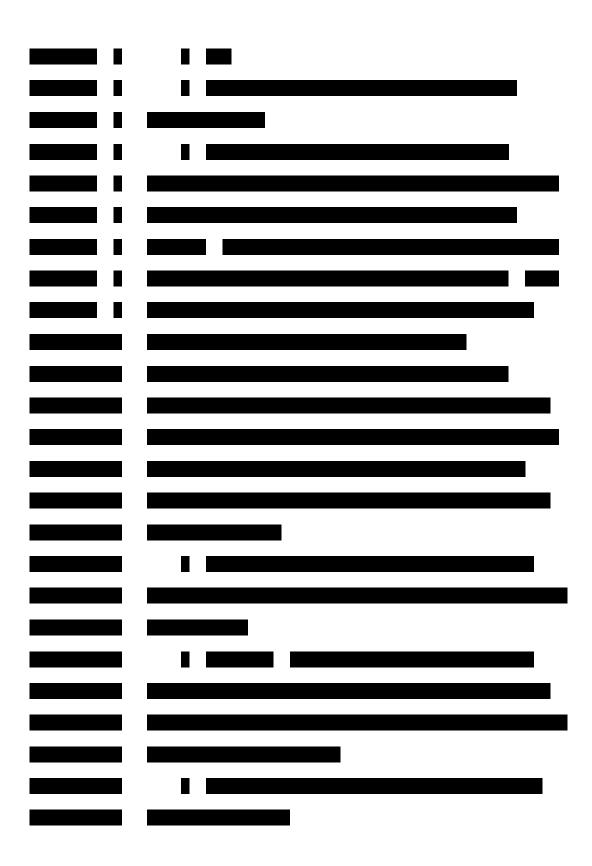


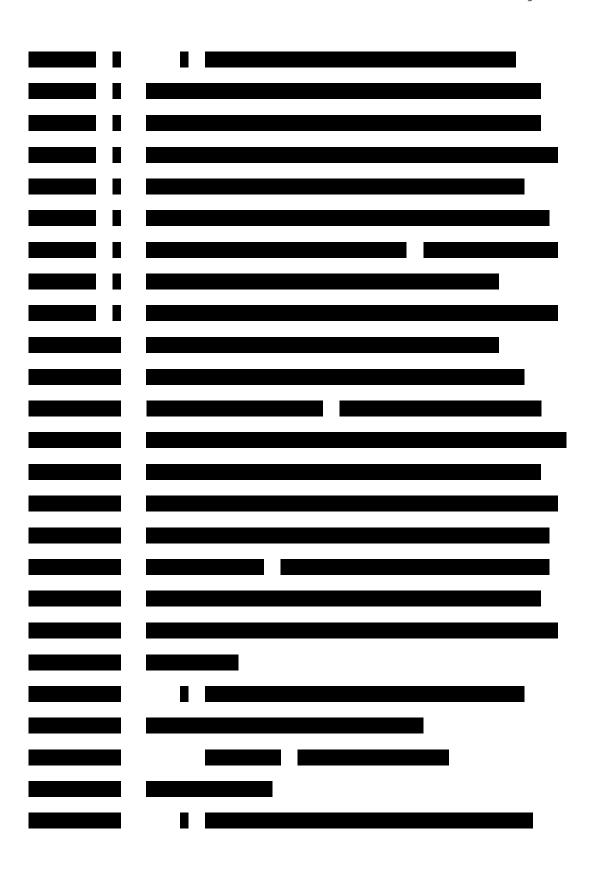
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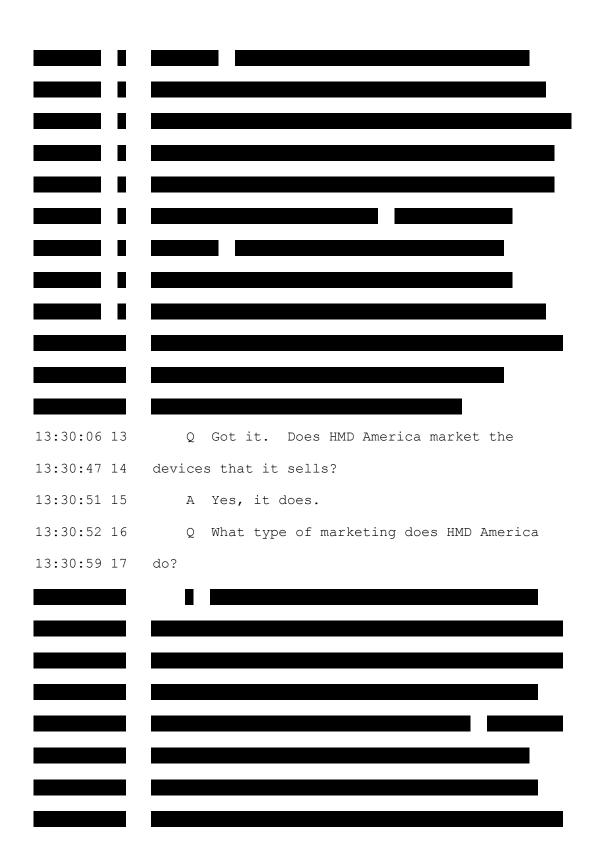
13:07:03 5	Q Are you currently working from home?
13:07:08 6	A Yes. I am working from home most of the
13:07:12 7	time, coming to the office maybe once per week.
13:07:23 8	Q When you're working from home, do you have
13:07:26 9	access to HMD America's documents?
13:07:28 10	A Yes, I do.
13:07:29 11	MS. KASH: Objection to form.
13:07:33 12	BY MR. TICE:
13:07:33 13	Q What types of documents do you access when
13:07:35 14	you're working from home?
13:07:40 15	A Generally process documents type of
13:07:44 16	element, also strategy documents that I've created
13:07:52 17	or am creating. We have different also local
13:07:59 18	sales documents, I'm analyzing sales and looking
13:08:01 19	at different elements there.
13:08:08 20	Q How do you access these documents?
13:08:13 21	A Through our Office365 SharePoint and I
13:08:25 22	have some on my hard drive clearly any type of
13:08:28 23	strategy documents that I'm working on daily.
13:08:31 24	Q You have access to your e-mail at home,
13:08:34 25	too, right?

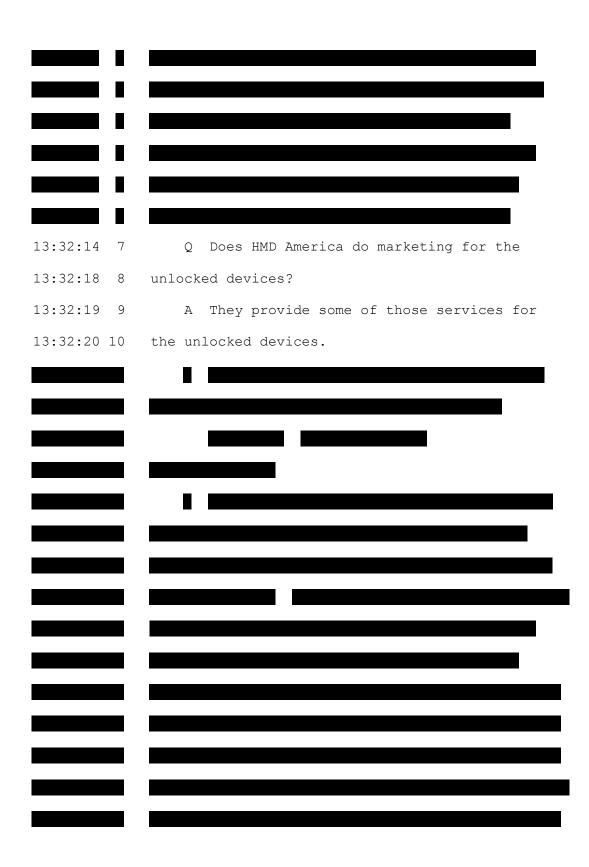












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13:33:46 2	BY MR. TICE:
13:33:46 3	Q Your previous answer, was that for the
13:33:48 4	devices, the unlocked devices?
13:33:52 5	A Correct.
13:34:39 15	Q You previously mentioned Jackie Kates.
13:34:42 16	Who is Jackie Kates?
13:34:43 17	A She is the head of marketing for North
13:34:56 18	America, HMD America.
13:34:57 19	Q Is she an employee of HMD Global?
13:35:00 20	A She is not. She is an employee of HMD
13:35:03 21	America in Miami.
13:35:09 22	Q Do you know who Jackie Kates records to?
13:35:12 23	A Yes. We both report to Juho, head of the
13.33.12 23	
13:35:25 24	